MORGAN, LEWIS & BOCKIUS LLP

(Pennsylvania Limited Liability Partnership)
Sarah E. Bouchard (NJ ID # 02807-1995)
John Lee (NJ ID # 18502007)
1701 Market Street
Philadelphia, PA 19103-2921
(215) 963-5077/5210
(215) 963-5001 (fax)
Attorneys for Defendants Smiths Detection, Inc. and Brian Bark

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

SALLY WHITE,

Plaintiff,

v.

SMITHS DETECTION, INC., SMITHS GROUP, PLC, STEPHEN PHIPSON, PHILIP BOWMAN, CHRISTOPHER GANE, BRIAN BARK AND PENNY BOYKO,

Defendants.

Civil Action No. 2:10-cv-04078-SRC-MAS

Document Electronically Filed

STIPULATION AND PROPOSED ORDER EXTENDING TIME FOR DEFENDANT CHRISTOPHER GANE TO RESPOND TO THE COMPLAINT

WHEREAS, Christopher Gane is named as a Defendant in this action and was served on September 14, 2010, thereby making October 5, 2010 the deadline for Mr. Gane to respond to the Complaint;

WHEREAS, counsel for the parties conferred and agreed that Mr. Gane shall have until October 19, 2010 to respond to the Complaint due to medical reasons affecting his counsel;

IT IS HEREBY STIPULATED AND AGREED by counsel for the parties that Mr.

Gane shall have until October 19, 2010 to respond to the Complaint.¹

Respectfully Submitted,

Dated: September 30, 2010

s/ Ellen O'Connell_

Ellen O'Connell, Esquire LAW OFFICES OF ELLEN O'CONNELL, LLC P.O. Box 132 Florham Park, NJ 07932 (973) 295-6800

Attorney for Plaintiff

s/ W. John Lee

Sarah E. Bouchard (NJ ID # 02807-1995) W. John Lee (NJ ID # 18502007) MORGAN, LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103-2921 (215) 963-5077/5210 (215) 963-5001 (fax)

Attorneys for Defendants Smiths Detection, Inc., Brian Bark, and Christopher Gane

s/ Jyotin Hamid_ Jyotin Hamid DEBEVOISE AND PLIMPTON, LLP 919 Third Avenue New York, NY 10022 Attorneys for Defendants Smiths Group, PLC and Philip Bowman

SO ORDERED

Hon. Stanley R. Chesler, U.S.D.J.

By submitting this Stipulation and Proposed Order, Mr. Gane does not waive, but rather expressly reserves, his right to raise any defense available under Rule 12(b), including the lack of personal jurisdiction.

CERTIFICATE OF SERVICE

I, W. John Lee, hereby certify that a true and correct copy of Defendant Smiths

Detection, Inc.'s Rule 7.1 Corporate Disclosure Statement was filed electronically and is

available for viewing and downloading from the ECF system and was served this 30th day of

September, 2010 by first-class mail postage prepaid, upon the following:

Ellen O'Connell, Esquire LAW OFFICES OF ELLEN O'CONNELL, LLC P.O. Box 132 Florham Park, NJ 07932 (973) 295-6800 Attorney for Plaintiff

Jyotin Hamid
Emily Mathier
Michael Potenza
DEBEVOISE AND PLIMPTON, LLP
919 Third Avenue
New York, NY 10022
Attorneys for Defendants Smiths Group, PLC and Philip Bowman

s/ W. John Lee
W. John Lee